

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW MEXICO**

COLT & JOE TRUCKING LLC,	§	
	§	
Plaintiff,	§	
	§	
v.	§	CASE NO. 1:24-cv-00391-JHR-GBW
	§	
JULIE SU, in her official capacity as	§	
Secretary of Labor, United States	§	
Department of Labor, JESSICA LOOMAN,	§	
In her official capacity as Principal Deputy	§	
Administrator, Division of Wage and Hour,	§	
and UNITED STATES DEPARTMENT	§	
OF LABOR,	§	
	§	
Defendants.	§	

**UNOPPOSED MOTION TO FILE *AMICUS CURIAE* BRIEF**

Dr. Liya Palagashvili respectfully requests leave to file the attached *amicus curiae* brief in the above-referenced matter. The parties consent to the filing of the brief.

Dr. Palagashvili is a senior research fellow at the Mercatus Center at George Mason University.<sup>1</sup> Her research focuses on labor relations and independent contracting. Plaintiff's case is important because it has drastic implications regarding the ability of workers to engage in their trade and make a living. It is also important to Dr. Palagashvili because her research and expertise encompass labor regulations that impact independent contracting. Dr. Palagashvili's interest is in giving the Court an opportunity to consider her research when deciding this case.

The proposed brief is desirable because it expresses and reflects Dr. Palagashvili's particular expertise in matters related to labor relations and independent contracting, and it offers the Court a perspective that is not directly addressed by the parties. The brief is relevant to the

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<sup>1</sup> The Mercatus Center, as an organization, takes no position on the arguments in the brief or the issues in the case.

disposition of the case because it provides empirical evidence applicable to the Department of Labor regulation at issue in the case and the potential effects thereof.

Undersigned counsel has conferred with counsel for Plaintiff and counsel for Defendants regarding Dr. Palagashvili's brief. Counsel for all parties confirmed that the parties consent to the filing of the brief. Counsel also conferred regarding the effect of Dr. Palagashvili's brief on the briefing schedule currently in place. The parties believe there is no need to modify the existing schedule, as each party will be able to respond to Dr. Palagashvili's brief as that party desires in the next brief the party is currently scheduled to file.

**RELIEF REQUESTED**

For the foregoing reasons, and with the consent of all parties, Dr. Palagashvili respectfully requests leave to file the attached *amicus curiae* brief.

Respectfully submitted,

/s/ Jeremy W. Hays

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### **CERTIFICATE OF SERVICE**

The undersigned certifies that the foregoing document was filed electronically in compliance with Local Rule 5.1. This document was also served on all counsel via e-mail service, on this 16th day of August, 2024.

/s/ Jeremy W. Hays

Jeremy W. Hays